	Page 86		Page 88
	C.1	1	A. I pulled contracts. In the
			contract files were certificates of
			insurance, correspondence that related to
_			that particular contract.
		5	Q. And you have circled those
	5 on Exhibit-A did you pull the physical		documents on Exhibit-1?
	6 documents for?	7	A. I haven't circled. I
	7 A. I pulled documents related		haven't gone through the entire exhibit
	8 to contract number 40899, I believe is	9	and circled them, because I don't have a
١.	9 the number, one of the numbers, and some 10 of these documents have numbers on them.	10	degree of accuracy to feel like I am
		11	telling you which ones exactly I looked
	This many or many	12	
1	22 Contract mes, and so me 1 passes	13	at. Q. What I would like you to do
	25 Contracts: 1 ma as 1 2 may 1		is I would like you to circle on
	and the state of t	14	Exhibit-A all of the documents that with
	2. Tuni Just Bong to many	15	
	a character point in any	16	a reasonable degree of certainty you can
1	= · and just the control of the cont	17	say, sitting here today, that you pulled
1		18	and reviewed prior to the deposition.
	15 for our riday.	19	A. I pulled and reviewed the
	A. It's going to take a while.	20	agreements and related documents
	21 I am going to have to go through these	21	documents that relate to those
	22 documents	22	agreements.
	Q. That's all right.	23	Q. And I would like you to
	A to see which of the	24	circle in Exhibit-A all of the ones that
	Page 87		Page 89
	1 agreements we looked at the actual	1	you can say with a reasonable degree of
	2 agreements.	2	certainty you reviewed.
	3 MR. SCHIAVONI: I am just	3	A. I don't know. I had other
	4 going to get coffee.	4	people do some of this for me.
١	5 THE WITNESS: It's going to	5	Q. Thank you, Ms. McKee.
	6 be a best guess.	6	Ms. McKee, have you now
	7 BY MR. SCHIAVONI:	7	circled on Exhibit-A those documents that
	8 Q. I don't want you to	8	with a reasonable degree of certainty you
	9 speculate.	9	can say you reviewed?
	10 A. I just don't remember. I	10	A. Yes, sir.
	11 pulled documents; I compared these to say	11	MR. SCHIAVONI: Okay. This
	12 is this in our files. So for me to tell	12	is a notice. I am going the mark
	13 you exactly which ones I know I looked	13	it as B. We will mark this as
	14 at all of the contracts, I know I looked	14	Exhibit-B, McKee-B.
	15 at some of the letters, I looked at some	15	MR. PHILLIPS: It was a
	16 of the certificates, but I am guessing as	16	notice for what?
	17 to tell you precisely which ones. And I	17	MR. SCHIAVONI: The notice I
	18 am not really comfortable doing that.	18	filed for this deposition.
	19 Q. Okay. So if you circle all	19	MR. PHILLIPS: For this one?
	20 of the documents on Exhibit-1 that with	20	MR. SCHIAVONI: Yes.
	21 some degree of reasonable certainty, you	21	MR. PHILLIPS: I have never
	22 can say you reviewed and you pulled the	22	seen it.
	in a control to a variation man land and a control of the control	1	A CONTANONI Was an Asla
	23 full document and reviewed from your	23	MR. SCHIAVONI: You can take



Page 132 Page 130 Q. I am referring back to 1 O. What did he tell you about 1 Exhibit-A, and let's look at the one that 2 the documents, any of the documents on 2 you circled the documents on. Okay? 3 this list? 3 A. Okay. A. We didn't speak specifically 4 4 Q. So what I would like to do about the documents other than the 5 5 is refer you to the documents on ability to definitively say that they are 6 6 Exhibit-A that you did not circle. And, 7 corporate records and that we keep them 7 first of all, let's turn to Exhibit-16A in the ordinary course of business. We 8 9 and B. didn't discuss the content of the 9 Tell us how you know this is 10 documents at all. 10 a document of the Burlington Northern 11 Q. Okay. And the counsel that 11 Santa Fe Railway or any of its 12 you spoke with on Friday, was that 12 predecessors. 13 Mr. Phillips? 13 A. Because it's issued to Great 14 A. I spoke with Mr. Phillips 14 Northern Railway Company in Saint Paul. 15 and with Mr. Roberts. 15 O. Where are insurance policies 16 Q. Did you speak with them 16 like 16A kept? 17 together at the same time, Mr. Phillips 17 A. They are kept by the risk 18 18 and Mr. Roberts? management department. 19 A. Yes, I did. 19 Q. And Exhibit-16A or B -- they 20 Q. Okay. Generally, was your 20 are pretty much identical -- does that 21 discussion with Mr. Phillips and exist in the risk management department Mr. Roberts about where the documents are 22 22 of Burlington Northern Santa Fe Railway? 23 23 located? A. In risk management or it is 24 No, it was not. 24 A. Page 133 Page 131 filed by risk management and corporate. O. Was your discussion at all Q. Are those the normal places 2 about the accuracy of the documents? 2 for the retention of documents or A. We did not discuss content 3 3 insurance policies? 4 of the documents. 4 Yes, they are. 5 Q. Was your discussion at all A. 5 Q. Turning to 17 and 18, I have about the completeness of the documents? 6 6 the same questions about those. 7 A. It was not. How can you tell us that 8 Q. So I take it you have not 8 those are Burlington Northern documents? 9 had any discussions with anyone about the 9 A. Again, it's a certificate accuracy or completeness of these 10 10 issued to Burlington Northern, Inc. in 11 11 documents? Saint Paul. A. I have not discussed the 12 12 O. And where are documents like content of the documents with anyone. 13 13 this found? 14 MS ESAYIAN: Okay. I don't 14 A. Documents like this are also 15 have any further questions. 15 found in either the risk management 16 MR. PHILLIPS: Thank you. 16 department or filed in corporate support 17 Anyone else, any questions? 17 as an archived record. 18 (No response.) 18 Q. In all cases regarding MR. PHILLIPS: Very well. I 19 19 Exhibits 16A, B, 17 and 18, are those 20 have some questions. 20 documents over 20 years old? 21 21 A. Yes, they are. 22 22 EXAMINATION Q. Do you see anything in any 23 of those documents that would give you 24 BY MR. PHILLIPS:

١		Page 134		Page 136
	7	- 1. k	1	appear to be over 20 years old?
	1 2	any reason to question their authenticity?	2	A. Yes, they do.
	3	A. No, I do not.	3	Q. Looking at Exhibit-28, tell
	4	Q. Turning to Exhibit-25, tell	4	us whether or not you think that is a
	5		5	BNSF Railway or predecessor document and
	6		6	why.
	7		7	A. I believe this is a railway
	8		8	document because I understand that
	9		9	Mr. Kaufmann was an employee of the
	10		10	railroad. I have seen the name. It
	1:		11	refers to a letter from Mr. Slattery.
	12		12	Q. Is there anything in that
	1:		13	that would indicate to you a question
	14	1 (*1	14	about its authenticity?
	1!		15	A. There is not.
١	1		16	Q. And is it over 20 years old?
	1'		17	A. Yes, it is.
١	1:		18	Q. Exhibit-29, tell us whether
١	1	Q. Is there anything in that	19	or not you think that is a document of
١	2		20	the BNSF Railway, Inc. or a predecessor?
	2	about its authenticity?	21	A. Yes, I do, because it is
	2	,	22	addressed to Mr. J.C. Kenady.
	2		23	Q. From whom?
	2	4 A. This document would be filed	24	A. From Mr. Slattery, again, an
١	+	Page 135		Page 137
Г	+	I probably with the policy to which it	1	internal document.
١	:	2 relates.	2	Q. Any question about its
	:	Q. Okay.	3	authenticity?
-		MR. SCHIAVONI: Objection,	4	A. No.
		5 calls for speculation, no	5	Q. Is it over 20 years old? A. Yes, it is.
		foundation.	6 7	A. Yes, it is. Q. Turning to Exhibit-30, tell
	H	MS. DeCRISTOFARO: I join.	8	us whether or not you believe that is a
	н	8 BY MR. PHILLIPS:	9	BNSF Railway document.
	11	Q. In looking at Exhibit-26, can you tell us why you believe this is a	10	A. I do, because it is a letter
	11	to the temporary to the		
4	• •	document regularly kept in BNSF Railway's documents?	12	•
		3 MR. SCHIAVONI: Leading.	13	
	1 1	THE WITNESS: Because it is	14	
		an internal communication between	15	
		John Garing and T.J. Slattery, who	16	Q. And is it over 20 years old?
		were both employees of Great	17	A. Yes, it is.
Total Barrier		Northern Railway.	18	
		BY MR. PHILLIPS:	19	
TO SECURE		Q. Anything else indicating on	20	
9		21 that document?	21	· ·
	2	A. No, not on this one.	22	
	:	Q. With regard to both	23	
		exhibits, 25 and 26, do those documents	24	A. He was land and tax

35 (Pages 134 to 137)

	Page 120		Page 140
	Page 138		
	1 commissioner for Great Northern Railway.	1	Q. Do you know who Mr. Wicka
	2 Q. Is there any question about	2	was?
	3 the authenticity of this letter?	3	A. I don't remember who
	4 A. No, there is not.	4	Mr. Wicka was.
	5 Q. And is it over 20 years old?	5	Q. Is there any question that
	6 A. Yes, it is.	6	you see from this document that would
	7 MR. SCHIAVONI: Objection,	7	cause you to question its authenticity?
	8 no foundation. I mean, Bob	8	A. No, there is not.
	9 MR. PHILLIPS: I understand.	9	Q. And it bears date what?
	10 Okay. I will rephrase.	10	A. August 11, 1958.
.v @	11 MR. SCHIAVONI: All the	11	Q. Looking at Exhibit-39, can
'CNH	12 witness is doing is reading the	12	you tell us whether or not you think
LI.	13 face of the document. Unless	13	that's a BNSF Railway document.
	14 there is some foundation for it	14	A. I believe that it is, yes.
	15 but I think that's all that's	15	Q. And why?
	16 happening, right I mean, there	16	A. It's addressed to Mr. J.C.
	is no inquiry that's been made to	17	Kenady, who is the land and tax
	determine how old it is. She is	18	commissioner, and it also bears a
	19 just looking and seeing what the	19	received stamp of the land and tax
	20 thing says, right?	20	department that I have seen in other
	MR. PHILLIPS: Yes.	21	documents. Q. From which company is that
	22 BY MR. PHILLIPS:	22	received stamp?
	Q. What date does the document	23 24	A. Great Northern.
	24 bear?	24	
	Page 139		Page 141
	1 A. I am sorry. On number?	1	Q. Any question as to this
	2 Q. Exhibit-32.	2	document's authenticity in your view?
	3 A. 32 bears the date	3	A. No.
	4 August 22nd, 1955.	4	Q. And it bears what date?
	5 Q. Looking at Exhibit-35, tell	5	A. March 25th, 1959.
	6 us whether or not you believe that	6	Q. Looking at Exhibit-41, tell
	7 document is a railway document.	7	us whether or not you believe that that
	8 A. It is a letter from T.J.	8	is a BNSF Railway document. A. I believe it is because it's
	9 Slattery, so it would be an internal	9 10	
6	10 document of the railway.	11	
2110	Q. Is there any question you	12	
12/12	12 have about its authenticity from its	13	D 1 150
	13 face?	14	
	14 A. No.	15	
	Q. And what date does it bear?	1	• -
	16 A. August 16, 1957.	16	its authenticity?
	16 A. August 16, 1957. 17 Q. Looking at Exhibit-38, what,	16 17	its authenticity? A. No, there is not.
	16 A. August 16, 1957. 17 Q. Looking at Exhibit-38, what, 18 if anything, indicates to you that that	16 17 18	its authenticity? A. No, there is not. Q. Look at Exhibit-43.
	16 A. August 16, 1957. 17 Q. Looking at Exhibit-38, what, 18 if anything, indicates to you that that 19 is a BNSF Railway document?	16 17 18 19	its authenticity? A. No, there is not. Q. Look at Exhibit-43. A. (Witness complies with
	A. August 16, 1957. Q. Looking at Exhibit-38, what, if anything, indicates to you that that is a BNSF Railway document? A. It's addressed to	16 17 18	its authenticity? A. No, there is not. Q. Look at Exhibit-43. A. (Witness complies with request.)
	A. August 16, 1957. Q. Looking at Exhibit-38, what, if anything, indicates to you that that is a BNSF Railway document? A. It's addressed to Mr. Kaufmann.	16 17 18 19 20	its authenticity? A. No, there is not. Q. Look at Exhibit-43. A. (Witness complies with request.) Q. What, if anything, indicates
	A. August 16, 1957. Q. Looking at Exhibit-38, what, if anything, indicates to you that that is a BNSF Railway document? A. It's addressed to Mr. Kaufmann. Q. And, again, who was he?	16 17 18 19 20 21	its authenticity? A. No, there is not. Q. Look at Exhibit-43. A. (Witness complies with request.) Q. What, if anything, indicates to you that this is a BNSF Railway document?
	A. August 16, 1957. Q. Looking at Exhibit-38, what, if anything, indicates to you that that is a BNSF Railway document? A. It's addressed to Mr. Kaufmann.	16 17 18 19 20 21 22	its authenticity? A. No, there is not. Q. Look at Exhibit-43. A. (Witness complies with request.) Q. What, if anything, indicates to you that this is a BNSF Railway document?

Γ		Page 142		Page 144
4			1	Q. Where was that document?
	1	MR. SCHIAVONI: Objection to	2	A. These documents in Great
	2	form. I am just going to object to this BNSF document.	3	Northern day, correspondence and related
	3		4	documentation was filed with the
	4	MR. PHILLIPS: Okay.	5	contracts. That is not how we file
	5	MR. SCHIAVONI: Whatever	6	correspondence today, but at that time it
	6	that means.	7	was. And those files are intact.
	7	MR. PHILLIPS: I will		Q. Were those contracts
П	8	rephrase.	8 9	numbered?
П	9	BY MR. PHILLIPS:	9 10	A. Yes, they were.
П	10	Q. What, if anything, indicates		Q. And which contract was
	11	to you that this is a document of BNSF	11	40899?
	12	Railway, Inc. or any of its predecessors?	12 13	= 4 4 4
П	13	A. It's addressed to Mr. James	R .	
П	14	Kenady, land and tax commissioner of	14	Okay. Q. But anyway that was one of
H	15	Great Northern Railway, which is a	15	Q. But anyway that was one of the contracts?
	16	predecessor, and it bears the same	16	A. It was one of the contracts
1	17	received stamp for the land and tax	17	I looked at, yes.
	18	department of Great Northern.	18	
1	19	Q. Is there any question that	19	Q. Any question in your mind as to the authenticity of this document?
	20	is raised in your mind as to the	20 21	A. No.
-	21	authenticity of this document?	22	
	22	A. There is not.	23	Q. And it bears what date? A. February 27, 1962.
	23	Q. And it bears what date?	24	Q. Looking at Exhibit-45, can
l	24	A. May 3rd, 1961. Am I reading	24	Page 145
		Page 143		
Γ	1	it correctly? The stamp is over the	1	you tell us what, if anything, indicates
	2	date.	2	to you that it is a business record of
١	3	Q. I understand. It says	3	BNSF Railway, Inc. or one of its
ı	4	May of 1961?	4	predecessors? A. It's addressed to
decomp	5	A. Yes.	5	Mr. Kenady, land and tax commissioner,
	6	Q. And look at Exhibit-44,	6	
Name of the least	7	please.	7	Great Northern Railway. Q. And what date does it bear?
9400	8	A. Yes.	8	A. March 19, 1962.
ON CORPORATION OF COR	9	Q. Can you tell us why you	9	
Caracteristics	10	believe, if you do, that this is a BNSF	10	
١	11	Railway Company document or a document o		
	12	one of its predecessors?	12	
ı	13	A. Because it is from	13	1
	14	Mr. Kenady, land and tax commissioner,	15	11 141
	15	and because it has a handwritten number	16	•
000	16	on it that is our contract number.	17	
	17	Q. And what is that?	18	1 1 10 1
	18	A. 40899.	19	
Management	19	Q. So would that document have	20	
	20	been in your contract file?	21	10
	21	THE RESTRICTION OF THE PARTY AS	22	
	22		23	
	1 1	CD DIVIN LIDG	24	
	124	BY MR. PHILLIPS:		

Γ		Page 146		Page 148
+	1	1	1	Mr. Heimsjo. It also bears the stamp of
	1 2	BY MR. PHILLIPS: Q. With regard to Exhibit-55,		the superintendent in Spokane, Washington
П		what indication is there, if any, that		as well as another received stamp.
		this is a record of BNSF Railway or its	4	Q. Is there any indication on
Ш		predecessor?		this document that it is a business
П	5 6	A. It has a received stamp that		record of BNSF Railway or its
		I recognize as being received in Spokane,		predecessor?
	8	Washington.	8	A. Yes.
	9	Q. What office in Spokane,	9	Q. What?
	10	Washington?	10	A. The superintendent stamp in
	11	A. It's the superintendent.	11	Spokane.
	12	Q. And was that an official	12	Q. Is there any question as to
	13	with the Great Northern Railway?	13	its authenticity?
	14	A. Yes, it was.	14	A. No.
	15	Q. Is there any question about	15	Q. And it bears what date?
	16	the authenticity of this document?	16	A. March 5th, 1974.
	17	A. No.	17	Q. If you would, look at
	18	Q. And it bears what date?	18	Exhibit-64, please.
	19	A. May 15, 1971.	19	A. (Witness complies with
Ш	20	Q. Look at Exhibit-59, please.	20	request.)
Ш	21	A. (Witness complies with	21	Q. Is there any indication on
	22	request.)	22	this document as to whether it is a
	23	Q. Can you tell us what, if	23	record of BNSF Railway, Inc. or its
	24	anything, indicates that this is a	24	predecessor?
L		Page 147		Page 149
٢	1	business record of BNSF Railway, Inc. or	1	
	2	one of its predecessors?	2	letterhead.
	3	A. It has a received stamp of	3	Q. And do you recognize that
	4	Burlington Northern, Inc. superintendent,	4	letterhead?
	5	Spokane, Washington that I recognize.	5	A. I do.
	6	It's also addressed to Burlington	6	Q. Any other indication?
	7	Northern.	7	A. No. It's from W.E. Bell.Q. And who was he?
	8	Q. To Mr. Heimsjo in Spokane?	8	
4	9	A. Correct.	9 10	A. Acting director, insurance. MS. DeCRISTOFARO: Note my
),	10	Q. Was he the superintendent	11	
	11	there?	12	
2000	12	A. Yes.	13	2.1
	13	Q. Is there any question in your mind as to the authenticity of this	14	
	14	* 4-	15	
	16		16	
	17		17	
	18	20 1071	18	A. There is not.
	19	· · · · · · · · · · · · · · · · · ·	19	
- 1	20		20	
	1	11 141	21	•
	21			
	22	request.)	22	
		request.)	22 23 24	A. (Witness complies with

38 (Pages 146 to 149)

Page 150	Page 152
1 O Is there any indication on 1 MS	. DeCRISTOFARO: Can you
1 G. Is there any interestion of	e one second?
Z tins document as a second as	R. PHILLIPS: Sure.
3 a record of BNSF Railway or any of its 4 BY MR. PF	
	an you tell us whether this
6 Mr. W.E. Bell at Burlington Northern 6 document b	pears any indication that it is
	ilway Company document?
	es, by virtue that it's
9 Q. Is there any question as to 9 addressed to	o Burlington Northern Railroad
10 the authenticity of this document? 10 Company to	o Mr. H.E. Halweg and bears a
11 A. No. 11 received sta	amp from Burlington Northern.
MS. DeCRISTOFARO: 12 Q. Is	there any question as to
13 Objection, no foundation. > 13 this docume	ent's authenticity?
14 BY MR PHILLIPS: V 14 A. N	o, there is not.
15 O. And it bears what date?	S. DeCRISTOFARO:
16 A. April 27, 1977.	tion, no foundation.
17 Q. Thank you. 17 BY MR. Pl	
11 you could, look at	and it bears what date?
15 Exhibit-72.	uly 18, 1984.
	low, referring to , do you have that before you?
[21 Tequest.]	Yes, I do.
122 Q. Can you ten me whether or	o whom is this letter
25 Hot this document has any marcaren man	
24 It is a record of Bitor reality of	Page 153
Page 151	It's addressed to Mr. Jon
1 its predecessors:	t Hedger Moyers.
11. 100 0000000000000000000000000000000	And do you know who
3 Mil. Halweg, who was the director of	-
1 Dullington Horatem, with the	I do. And I believe I
5 received statistical for the famous.	earlier that I did not, but
Q. Of which company? A. Burlington Northern, Inc.	ng with the company, I do.
8 Q. Was that the name of the 8 Q.	Okay. And who is
9 company in 1978? 9 Mr. Moye	ers?
10 A. Yes, it was.	Outside counsel for the
11 O And this letter bears what 11 railroad.	
12 date? 12 Q.	Now, where are documents
13 A. July 11, 1978.	kept?
114 Q. Is there any question as	By the claims department.
15 this documents additionally.	And does this appear to you
11. 110.	ocument regularly kept in the f business by BNSF Railway?
11201 - 120	It does.
16 Objection, no foundation	And this is a letter from
119 DI WIK. THEEH S.	ompany to which person?
20 9. 110000	It's a letter from Zurich to
21 Exhibit-79, picase:	outside counsel.
22 A. (Witness complies with 23 Q.	Okay.
24 Q. Can you tell us whether 24 A.	Burlington Northern, I mean.

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39 (Pages 150 to 153)

[Page 154		Page 156
П	1	Q. And I probably asked you	1	a document regularly kept in the course
		this: Is this a document that's		of business at BNSF Railway Company?
955		regularly kept in the course of business	3	A. Yes, it does.
		at BNSF?	4	Q. And how do you know that?
Name of the last	5	A. Yes.	5	A. It's addressed to Burlington
2000	6	MR. IFFT: Objection,	6	Northern and Santa Fe Railway, and it's
	7	foundation.	7	addressed to Paul Hoferer, who was vice
	8	MR. PHILLIPS: Objection?	8	president and general counsel.
200	9	MR. IFFT: No foundation.	9	Q. And where is this document
SOURCE PARTY NAMED IN COLUMN 1	10	MR. PHILLIPS: So are you 🚺	10	kept?
MERCE STATES	11	questioning the authenticity of	11	A. By the claims department.
	12	81?	12	Q. Now, the documents that you
	13	MR. IFFT: You are going	13	have earlier said that you looked at,
	14	through this exercise, Bob, which	14	what did you mean by that, the ones that
	15	you seem to feel a need to do, and	15	you have circled on Exhibit-A?
Comment	16	if you want to do that, that's	16	A. I actually went into the
1	17	fine. But I don't think you have	17	warehouse or I had other people do for me
NAME AND ADDRESS OF	18	laid the foundation, if that's	18	and pull files, and we went through
	19	what you are trying to do.	19	files. And we compared them to
	20	MR. PHILLIPS: Well, I don't	20	documents, and we did a sampling to
200	21	need to if you are not going to	21	prepare for this deposition. We had short notice and did what we could.
	22	object to it.	22	Q. Did you determine whether or
I	23	MR. IFFT: I am not going to	23	not those documents are documents
	24	do it on the record. I will talk	24	
		Page 155		Page 157
	1	to you about it afterwards.	1	regularly kept in the course of business
	2	MR. PHILLIPS: Very well.	2	of BNSF Railway or any of its
	3	MR. IFFT: You are the one	3	predecessors?
	4	that feels compelled to do this,	4	A. Yes, we did.
	5	so I am going to make my	5	MR. SCHIAVONI: Objection to
,	6	objections.	6	form.
K	7	MR. PHILLIPS: And I will	7	BY MR. PHILLIPS:
),	8	just state briefly what I am	8	Q. And did you have any question or concern as to the
	9	trying to do is avoid calling this	9	authenticity of any of those documents?
	10	witness as a witness at the	10 11	A. I
	11	hearing and lay a foundation for	12	
	12	such documents as I can in order	13	_
	13	to make it briefer. But I	14	THE THEFT INCO. I I'I
	14	understand your objection.	15	on printing W
	15	MR. IFFT: Okay.	16	11 6
	16	BY MR. PHILLIPS:	17	-
	17	Q. Would you look at	18	THE WHAT IE GO G
	18	Exhibit-82, please? A. (Witness complies with	19	Trans I IDC
	19		20	- 1 1 1 1
	20	request.) Q. And do you recognize that	21	
	21 22	Q. And do you recognize that document?	22	would likely be?
	23	A. Yes, I do.	23	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~
	11		24	
	L24	Contraction of the second seco		40 (Dages 154 to 157
	24	a a to the ho	24	

THE WITNESS: They were in the same location as other similar documents that are kept in the ordinary course of business. MS. DeCRISTOFARO: All these objections, also for lack of foundation. BYMR. PHILLIPS: MR. SCHIAVONI: Objection to form. MS. DeCRISTOFARO: I join. THE WITNESS: Yes. MR. PHILLIPS: Chander of they in a place where, if authentic, they would likely be? MR. SCHIAVONI: Objection to form. MS. DeCRISTOFARO: I join. THE WITNESS: Yes. MR. PHILLIPS: Ox. MR. PHILLIPS:	ſ		Page 150		Page 160
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23 A. The document is dated 23 put in the file.		- 1	nut into is the railroad's files?		
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41 (Pages 158 to 161)